

**IN THE UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>	§	<b>Chapter 11</b>
	§	
<b>STEWARD HEALTH CARE SYSTEM LLC, <i>et al.</i>,</b>	§	<b>Case No. 24-90213 (CML)</b>
	§	
<b>Debtors.<sup>1</sup></b>	§	<b>(Jointly Administered)</b>
<hr style="border: 0.5px solid black;"/>		
<b>THE COMMONWEALTH OF MASSACHUSETTS</b>	§	
	§	
<b>Appellant,</b>	§	
	§	
<b>v.</b>	§	
	§	
<b>STEWARD HEALTH CARE SYSTEM LLC, <i>et al.</i>,</b>	§	<b>Civil Action No 4:25-cv-2825</b>
	§	
<b>Appellee.</b>	§	
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<b>TRACO INTERNATIONAL GROUP S. DE R.L.</b>	§	
	§	
<b>Appellant,</b>	§	
	§	
<b>v.</b>	§	
	§	
<b>STEWARD HEALTH CARE SYSTEM LLC, <i>et al.</i>,</b>	§	<b>Civil Action No 4:25-cv-2829</b>
	§	
<b>Appellee.</b>	§	
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<sup>1</sup> A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://restructuring.ra.kroll.com/Steward> (the "Debtors" or "Appellees"). The Debtors' service address for these chapter 11 cases is 1900 N. Pearl Street, Suite 2400, Dallas, Texas 75201.

**DR MANISHA PUROHIT, et. al.,**

**Appellant,**

**V.**

**STEWART HEALTH CARE SYSTEM  
LLC, et al.,**

**Appellee.**

**Civil Action No 4:25-cv-2901**

## **JOINT MOTION OF APPELLANTS TO CONSOLIDATE APPEALS**

Pursuant to Federal Rules of Bankruptcy Procedure 8003(b)(2), 8013 and 8018, Federal Rules of Appellate Procedure 6 and 3(b)(2), Southern District of Texas Local Rule 7 and 7.6, and this Court's Procedures, The Commonwealth of Massachusetts ("Massachusetts"), TRACO International Group S. de R.L. ("TRACO"), and Dr. Manisha Purohit, Dr. Diane Paggioli, Dr. James Thomas, Dr. Thomas Ross, Dr. Michael Regan, Dr. Peter Lydon, Dr. Sridhar Ganda, Dr. A. Ana Beesen, Dr. Benoy Zachariah, Dr. Barry Arkin, Dr. Bruce Kriegel and Dr. Gary Miller, participants in and beneficiaries of certain of the Debtors' deferred compensation plans, on their own behalf and on behalf of other participants in those deferred compensation plans (collectively, the "Participants" and, with the Commonwealth and TRACO, the "Appellants"), by and through the undersigned counsel, hereby file this *Joint Motion Of Appellants To Consolidate Appeals* respectfully request that this Court consolidate the appeals assigned Case Nos.: 4:25-cv-2825, 4:25-cv-2829, and 4:25-cv-2901 (collectively, the "Appeals").

## BACKGROUND

On April 29, 2025, the Appellees filed their *Motion of Debtors for Entry of an Order (I Approving Settlement with FILO Secured Parties; (II) Authorizing and Directing Transfer of*

*Assets in Connection Therewith; (III) Authorizing Amendment to FILO DIP Credit Agreement and Continued Use of Cash Collateral; (IV) Granting Adequate Protection; (V) Approving Assumption and Assignment Procedures and Form and Manner of Notice of Assumption and Assignment; and (VI) Granting Related Relief Filed by Debtor Steward Health Care System LLC* [ECF 4746].

A hearing was held on May 29, 2025 [ECF 5006]. On May 30, 2025, the Bankruptcy Court issued its oral ruling in favor of the Debtors in the form of its *Courtroom Minutes* [ECF 5018].

On June 2, 2025, the Bankruptcy Court entered its *Order (I) Approving Settlement with FILO Secured Parties; (II) Authorizing and Directing Transfer of Assets in Connection Therewith; (III) Authorizing Amendment to FILO DIP Credit Agreement and Continued Use of Cash Collateral; (IV) Granting Adequate Protection; (V) Approving Assumption and Assignment Procedures and Form and Manner of Notice of Assumption and Assignment; and (VI) Granting Related Relief* [ECF 5035] (the “Order”).

Appellants Massachusetts and TRACO filed notices of appeal of the Order on June 13, 2025 [ECF 5123, 5128]. Massachusetts amended its notice of appeal on June 14, 2025 [ECF 5130]. The Participants filed a notice of appeal on June 20, 2025 [ECF 5161].

### **ARGUMENT**

When parties file separate timely notices of appeal, Federal Rule of Bankruptcy Procedure 8003(b)(2) and Federal Rule of Appellate Procedure 3(b)(2) allow the court to consolidate appeals. Here, the appeals pertain to the same Order, involve the same record, and raise similar and overlapping issues. Thus, Appellants submit that consolidating the Appeals would promote the efficient use of judicial resources and be in the best interest of all parties. Accordingly, Appellants respectfully request that this Court consolidate the Appeals.

**CONCLUSION**

Appellants respectfully request that the Court consolidate the Appeals, substantially in the form of order attached hereto as **Exhibit A**.

*(Signature Page to Follow)*

Dated: June 30, 2025

*COMMONWEALTH OF MASSACHUSETTS,*

*DR. MANISHA PUROHIT ET AL.*

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**CERTIFICATE OF COMPLIANCE WITH WORD LIMIT, TYPEFACE  
REQUIREMENTS, AND TYPESTYLE REQUIREMENTS**

I hereby certify that the foregoing motion complies with the word limit of Federal Rule of Bankruptcy Procedure 8013(f)(3)(A) because, excluding the parts of the motion exempted by Federal Rule of Bankruptcy Procedure 8015(g) and the accompanying documents exempted by Federal Rule of Bankruptcy Procedure 8013(f)(3), this document contains 487 words. This document complies with the typeface requirements of Federal Rules of Bankruptcy Procedure 8013(f)(2), 8015(a)(5), and 8015(a)(6) and this Court's Procedures because it has been prepared in a proportionally spaced typeface using Microsoft Word in 12-point Times New Roman font.

/s/ Hugh M. McDonald

Hugh M. McDonald

**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule 7 and the Court Procedures of the Honorable United States District Judge George C. Hanks, Jr., I hereby certify that on June 30, 2025, I, counsel for Appellants attempted to confer with Appellees in a good faith effort to resolve the issues raised in the above motion.

/s/ Hugh M. McDonald

Hugh M. McDonald

**CERTIFICATE OF SERVICE**

I hereby certify that on June 30, 2025, a true and correct copy of the foregoing was served on all parties registered to receive electronic notice through the Court's CM/ECF automatic electronic notice system.

/s/ Hugh M. McDonald

Hugh M. McDonald